



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10

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OFFICE OF  
ENVIRONMENTAL  
CLEANUP

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January 8, 2015

Mr. Miles Dyer  
Acting Director, Environmental Compliance  
Senior Staff Environmental Engineer  
Jorgensen Forge Corporation  
8531 E. Marginal Way S  
Tukwila, Washington 98108

Mr. Will Ernst  
EO&T EHS Remediation  
The Boeing Company  
PO Box 3707 M/C 1W-12  
Seattle, Washington 98124

USEPA SF



1418141

Re: EPA Comments – Supplemental Removal Action Completion Report Jorgensen Forge  
Outfall Site, Seattle, Washington

Dear Mr. Dyer and Mr. Ernst:

The US Environmental Protection Agency (EPA) has reviewed the Supplemental Removal Action Completion Report for the Jorgensen Forge Outfall Site, submitted to the EPA by the Boeing Company and Jorgensen Forge.

The report itself is adequate as it pertains to a summary of the work that has been done under the second modification to the existing Removal Order. However, the EPA is concerned with the language the report raises in the section "Sampling of Adhered Silty-Sand Material" where the section states "...it may be inferred that the expedited backfilling by EMJ (described above) allowed residual post-dredge contamination to be dispersed in the lower portions of the cofferdam hole during backfilling." This language needs to be removed from the report as it is beyond the scope of the work that should have been addressed in this completion report.

Additionally, regarding the removed sheetpile that was used for the coffer dam, the work plans for the 2015 work by the respondents needs to include specific plans and criteria as well as standards and procedures for decontamination of the sheet piles, after the work is completed. The EPA is requiring that the workplan will need to include provisions for a decon area where any excess soils adhering to the sheet pile after final extraction can be removed. Pressure washing is also acceptable. Any of the applicable self-implementing decon standards of 40 CFR 761.79 would also be acceptable. A reasonable alternate decon standard can be established pursuant to 40 CFR 761.79(h) with the substantive elements documented through the CERCLA ARAR process and associated work plans. The EPA is also concerned with the high concentrations of PCB in the stained areas, even though the areal extent of contamination was limited and the total PCB mass is likely very low. When decon occurs, the Respondents will need to look at whether there are other chemical constituents other than PCBs that might be associated with creosote (the likely source of the dark staining) that need to be considered as

part of decontamination. Presently, while not in use, the sheetpile must be effectively stored and contained with adequate booms and coverings that prevent any residual material from entering the waterway following heavy rain or storm events. Further decontamination of the sheet piles before being placed for the 2015 work is not needed since these sheet piles will be placed within a contaminated area.

Within 30 days, please submit a revised report with the aforementioned language removed.

Should you have any questions I can be contacted at sanga.ravi@epa.gov or 206-553-4092. Inquiries of a legal nature need to be addressed to Richard Mednick at mednick.richard@epa.gov or 206-553-1797.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ravi Sanga', with a stylized flourish at the end.

Ravi Sanga  
Remedial Project Manager  
Site Cleanup Unit 3  
Office of Environmental Cleanup

cc:

Dee Gardner  
Sound Earth Strategies, Inc.

Tom Colligan  
Floyd Snider

Amy Essig-Desai  
Farallon

Ryan Barth,  
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Romy Freier-Coppinger  
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